

**ENTERED**

December 22, 2022

Nathan Ochsner, Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

UNITED STATES OF AMERICA

v.

JORGE ZAMORA-QUEZADA

§  
§  
§  
§

Case No. 7:18-cr-00855

AGREED PROPOSED ORDER

The Court has considered Defendant's Agreed Motion for a Protective Order, and finding it to be meritorious, the Court GRANTS said Motion.

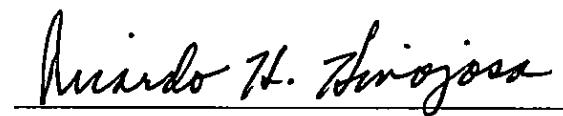
## THE FOLLOWING IS THEREFORE ORDERED:

1. The materials to be provided in response to the Court's November 8, 2022 order and December 12, 2022 order likely will include confidential information concerning individuals who are not parties to the above-referenced case.
2. Such confidential information may include: (1) identification numbers, and Social Security numbers, date of birth; (2) individually identifiable health and medical information, including (i) information concerning past, present, or future physical or mental health conditions, (ii) the provision of health care to an individual, (iii) past, present, or future payment for the provision of health care to an individual; and (3) other private, non-public information concerning non-parties to this proceeding (collectively, the "Confidential Information").
3. The Court hereby Orders that the parties take all appropriate steps to protect the Confidential Information from unnecessary dissemination.
4. The Confidential Information shall be utilized by the parties solely in connection with this case and for no other purpose.

5. The Confidential Information, and any notes or other record of such materials or their contents, shall not be disclosed either directly or indirectly to any person or entity other than the parties, the parties' counsel, persons employed to assist the parties' counsel, individuals who are interviewed as potential witnesses in the case or such other persons as to whom the Court may authorize disclosure.
6. The Confidential Information shall not be copied or reproduced except as necessary to provide copies of the material for use by an authorized person as described above to prepare or assist the parties' counsel.
7. The parties' counsel shall keep and maintain a record of all individuals to whom the Confidential Information is provided.
8. Defendant's counsel shall inform the Defendant of the provisions of the Protective Order and direct the Defendant not to disclose or use any Confidential Information in violation of this Protective Order.
9. This Protective Order does not constitute a ruling on the question of whether any particular material is properly admissible and does not constitute any ruling on admissibility.
10. The Court further ORDERS that each and every receiving Party to whom the records produced pursuant to the November 8, 2022 order and the December 12, 2022 order are disclosed SHALL EXECUTE a certification in the form attached to the ORDER as Exhibit A.

11. The Court further ORDERS counsel for the parties to KEEP AND MAINTAIN copies of each and every Exhibit A executed in accordance with this Order.

SIGNED this 22<sup>nd</sup> day of December, 2022.



Honorable Ricardo Hinojosa  
United States District Court Judge

Exhibit A

**CERTIFICATION**

I hereby certify that I have read the Protective Order regarding certain information in the case styled *United States of America v. Jorge Zamora- Quezada*, Case No. 18-CR-0855, in the United States District Court for the Southern District of Texas, McAllen Division, dated December \_\_\_, 2022. As a Receiving Party, I agree that I will not disclose Confidential Information except to the parties, the parties' counsel, as well as any investigators and expert witnesses retained by the parties and/or their counsel in this case. I will maintain the Confidential Information in accordance with the Order.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Company: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_